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Attorneys for Plaintiff  
*TS-Optics Corporation*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

## TS-OPTICS CORPORATION,

Case No. 8:24-cv-01974-DOC-DFM

Plaintiff,

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**PLAINTIFF'S REPLY TO  
DEFENDANT'S  
COUNTERCLAIMS**

## MICROSOFT CORPORATION,

## JURY TRIAL DEMANDED

Defendant.

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1 Plaintiff TS-Optics Corporation (“TS-Optics”) hereby replies to Defendant  
2 Microsoft Corporation’s (“Microsoft”) Counterclaims as follows:

3 **PARTIES**

4 1. Admitted.

5 2. Admitted.

6 **JURISDICTION AND VENUE**

7 3. Denied.

8 4. Admitted that this Court has jurisdiction to hear counterclaims related  
9 to TS-Optics’ allegations. Denied that Microsoft has any such claims or has properly  
10 pled such claims.

11 5. Admitted that this Court has jurisdiction to hear counterclaims related  
12 to TS-Optics’ allegations. Denied that Microsoft has any such claims or has properly  
13 pled such claims.

14 6. Admitted that this Court is the proper venue to hear counterclaims  
15 related to TS-Optics’ allegations. Denied that Microsoft has any such claims or has  
16 properly pled such claims.

17 **COUNT I (Declaratory Judgment of Noninfringement of the ’055 Patent)**

18 7. TS-Optics realleges and incorporates by reference the replies in  
19 Paragraphs 1-6 of its Reply.

20 8. Admitted as to TS-Optics’ allegations. Otherwise, denied.

21 9. Admitted that TS-Optics alleges infringement and that Microsoft  
22 purports to deny the allegation. Otherwise, denied.

23 10. Denied.

24 11. Denied.

25 **COUNT II (Declaratory Judgment of Invalidity of the ’055 Patent)**

26 12. TS-Optics realleges and incorporates by reference the replies in  
27 Paragraphs 1-11 of its Reply.

28 13. Admitted as to TS-Optics’ allegations. Otherwise, denied.

1           14. Admitted that TS-Optics alleges infringement and invalidity, and that  
2 Microsoft purports to deny the allegations. Otherwise, denied.

3           15. Denied.

4           16. Denied.

5           **COUNT III (Declaratory Judgment of Noninfringement of the '709 Patent)**

6           17. TS-Optics realleges and incorporates by reference the replies in  
7 Paragraphs 1-16 of its Reply.

8           18. Admitted as to TS-Optics' allegations. Otherwise, denied.

9           19. Admitted that TS-Optics alleges infringement and that Microsoft  
10 purports to deny the allegation. Otherwise, denied.

11           20. Denied.

12           21. Denied.

13           **COUNT IV (Declaratory Judgment of Invalidity of the '709 Patent)**

14           22. TS-Optics realleges and incorporates by reference the replies in  
15 Paragraphs 1-21 of its Reply.

16           23. Admitted as to TS-Optics' allegations. Otherwise, denied.

17           24. Admitted that TS-Optics alleges infringement and invalidity, and that  
18 Microsoft purports to deny the allegations. Otherwise, denied.

19           25. Denied.

20           26. Denied.

21           **PRAYER FOR RELIEF**

22           WHEREFORE, TS-Optics prays for the following relief with respect to  
23 Microsoft's counterclaims:

24           A. A dismissal with prejudice of Microsoft's counterclaims;

25           B. An adjudication that Microsoft is not entitled to any relief on its  
26 counterclaims, including, without limitation, any fine or damages; and

27           C. Costs and such further relief to which TS-Optics is entitled, and which  
28 the Court deems just and equitable.

**DEMAND FOR JURY TRIAL**

TS-Optics demands a trial by jury on all issues so triable.

DATED: December 17, 2024

Respectfully submitted,

/s/ Benjamin T. Wang

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## RUSS, AUGUST & KABAT

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Central District of California using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

/s/ Reza Mirzaie  
Reza Mirzaie

## RUSS, AUGUST & KABAT